

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

OCT 10 2 35 PM '02

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

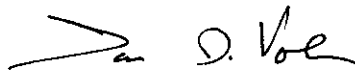
EXPERIMENTAL PERIODICALS  
CO-PALLETIZATION DROPSHIP DISCOUNTS

Docket No. MC2002-3

**R.R. DONNELLEY & SONS COMPANY INTERROGATORIES TO THE  
UNITED STATES POSTAL SERVICE WITNESS ALTA FH TAUFIQUE  
(DONNELLEY/USPS-T1-1-2)**

R.R. Donnelley and Sons Company submits the associated interrogatories under section 26 of the rules of practice.

Respectfully submitted,



Ian D. Volner  
N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005-3917  
(202) 962-4800  
[idvolner@venable.com](mailto:idvolner@venable.com)  
[nfwiggins@venable.com](mailto:nfwiggins@venable.com)

Counsel to R.R. Donnelley & Sons Company

October 10, 2002

**R.R. DONNELLEY/USPS-T1-1.** At lines 16-20 of page 6 of your testimony you say:

Some mail that is combined in a co-mailing operation would also be eligible for the proposed co-palletization discount. Under the rules discussed below, only that portion of co-mailed volume that moves from sacks (if titles or versions are sorted independently) onto pallets that are dropshipped would qualify for the additional incentive.

- a. Please confirm that a bundle of co-mailed pieces consists of more than one title, edition, issue or version packaged together.
- b. If you did not confirm, please supply your understanding of the contents of a co-mailed bundle.
- c. If you did confirm do you intend that no portion of co-mailed volume will qualify for the additional incentive because none will be "sorted independently"?
- d. If that is not your intention, please explain the circumstances under which "mail that is combined in a co-mailing operation" will qualify for the additional incentive.

**R.R. DONNELLEY/USPS-T1-2.** At lines 12-14 of page 3 of your testimony you observed that:

Co-palletization combines bundles of different publications going to the same destination ADC or SCF, on the same pallet. Co-mailing combines different publications in the same bundles, with the bundles then combined on pallets.

If by taking advantage of a co-mailing a mailer is able to create enough bundles to make up a pallet, will the mailer be entitled to the co-palletization discount if, but for the co-mailing combination, there would not have been sufficient density/weight to make up a pallet?

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon the Postal Service in accordance with section 12(c) of the rules of practice.

*N. Frank Wiggins*  
N. Frank Wiggins *per 10V*  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W., Suite 1000  
Washington, DC 20005-3917  
202.962.4957  
[nfwiggins@venable.com](mailto:nfwiggins@venable.com)  
Counsel to RR Donnelley & Sons Company

October 10, 2002